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*Counsel for Vonage Marketing, LLC*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

**JOINDER OF VONAGE MARKETING, LLC  
TO THE OBJECTION TO CONFIRMATION OF THE  
DEBTORS' FIRST AMENDED JOINT PLAN OF LIQUIDATION  
FILED BY SAMSUNG AMERICA ELECTRONICS, INC.**

Vonage Marketing, LLC (formerly doing business as Vonage Marketing, Inc.) (“Vonage”), creditor and holder of an administrative expense claim in the above-captioned case, by counsel, hereby joins in the Samsung America Electronics, Inc.’s Objection to Confirmation of the Debtors’ First Amended Joint Plan of Liquidation (the “Objection”) as follows:

1. On or about December 19, 2008, Vonage timely filed a claim (designated Claim No. 1056) in the amount of \$69,022.58 in accordance with the procedures governing the filing of claims entitled to priority under 11 U.S.C. § 503(b)(9) in this case for goods sold to the Debtors in the ordinary course of the Debtors' business and received by the Debtors within 20 days before the date of the commencement of this case.

2. On or about January 29, 2009, Vonage timely filed a secured claim (designated Claim No. 8012) in the amount of \$555,979.26.

3. The Debtors filed numerous objections in response to Vonage's claims.

4. On September 29, 2009, The Debtors filed the First Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and Its Affiliated Debtors and Debtors in Possession and Its Official Committee of Creditors Holding General Unsecured Claims (the "Plan").

5. Vonage adopts the grounds and authorities set forth in the Objection of Samsung as Vonage's objection to the Plan.

6. Additionally, Vonage reserves the right to rely on the arguments and authorities contained in the objections of other creditors filed in response to the Plan.

VONAGE MARKETING, LLC

*/s/ W. Alexander Burnett*

By: \_\_\_\_\_  
Counsel

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing Joinder of Vonage Marketing, LLC was filed and served this 16th day of November, 2009, electronically using the Court's ECF System, was sent by electronic mail to [circuitcityservice@mcguirewoods.com](mailto:circuitcityservice@mcguirewoods.com) and [project.circuitcity@skadden.com](mailto:project.circuitcity@skadden.com), and was sent by first class mail, postage prepaid, to the entities at the addresses indicated below:

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/s/ *W. Alexander Burnett*  
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